

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

| | | |
|-------------------------------|---|------------------------------|
| CONNECTICUT GENERAL LIFE | § | |
| INSURANCE COMPANY AND CIGNA | § | |
| HEALTH AND LIFE INSURANCE | § | JURY DEMANDED |
| COMPANY | § | |
| | § | |
| VS. | § | CIVIL ACTION NO. 4:16-cv-571 |
| | § | |
| ELITE CENTER FOR MINIMALLY | § | |
| INVASIVE SURGERY LLC; | § | |
| HOUSTON METRO ORTHO AND | § | |
| SPINE SURGERY CENTER LLC; and | § | |
| ELITE AMBULATORY SURGERY | § | |
| CENTERS LLC d/b/a ELITE | § | |
| SURGICAL AFFILIATES | § | |

**Joint Motion to Extend Deadlines to File
Responses to Motions to Compel**

Defendants Elite Center for Minimally Invasive Surgery LLC, Houston Metro Ortho and Spine Surgery Center LLC, and Elite Ambulatory Surgery Centers LLC d/b/a Elite Surgical Affiliates (collectively, “Defendants”) and plaintiffs Cigna Connecticut General Life Insurance Company and Cigna Health and Life Insurance Company (“Cigna”) file this joint motion requesting that the Court extend the parties’ respective deadlines to respond to the pending motions to compel.

Specifically, the parties request that Defendants’ deadline to respond to Plaintiffs’ Motion to Compel Production of Documents (Docket No. 40) be extended to **December 6, 2017** (from December 1, 2017), and Cigna’s deadline to respond to Defendants’ Motion to Compel (Docket No. 43) be extended to **December 18, 2017** (from December 13, 2017). The parties request these extensions in the interest of justice and not for the purpose of unreasonable delay. A proposed agreed order is submitted with this motion.

Date: November 30, 2017

*/s/ Brian C. Pidcock**

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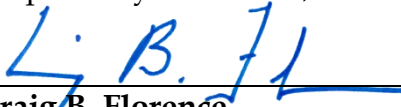
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INSURANCE COMPANY**

* Signed with Permission

Respectfully submitted,



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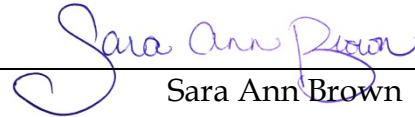
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SURGERY CENTER LLC, AND
ELITE AMBULATORY SURGERY
CENTERS LLC D/B/A ELITE
SURGICAL AFFILIATES**

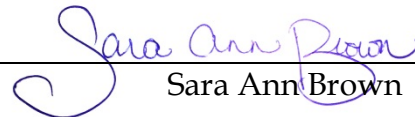
Certificate of Conference

This is to certify that the undersigned counsel for Defendants has conferenced with counsel for Cigna, and both parties are in agreement regarding the relief sought in this motion.


Sara Ann Brown

Certificate of Service

On November 30, 2017, the undersigned electronically filed this document with the clerk of court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.


Sara Ann Brown